

faegredrinker.com

Abigail M. Luhn Associate abigail.luhn@faegredrinker.com 973-549-7237 direct Faegre Drinker Biddle & Reath LLP 600 Campus Drive Florham Park, New Jersey 07932 +1 973 549 7000 main +1 973 360 9831 fax

April 14, 2023

## **VIA ECF**

Honorable Ann Marie Donio
United States Magistrate Judge
U.S. District Court - District of New Jersey
Mitchell H. Cohen Courthouse
1 John F. Gerry Plaza, Courtroom 3B
4th & Cooper Streets
Camden, NJ 08101

Re: Raymond Lamar Brown v. Richard Smith, et al.

Case No. 1:20-cv-08463-NLH-AMD

Dear Judge Donio:

We write on behalf of Plaintiff Raymond Lamar Brown ("Plaintiff") in the above-captioned matter and in follow up to the Court's March 15, 2023 Order granting Plaintiff's request for a 30-day extension pending consummation of settlement, which Order sets the administrative termination deadline for the case as April 20, 2023.

The parties have been and are making progress to finalize releases and exchange signed papers ancillary to those releases.

Plaintiff respectfully requests an additional thirty (30) days, until May 22, 2023, to file the requisite dismissal papers per Federal Rule of Civil Procedure 41 as consummation of the agreement(s) is/are processed.

We have conferred with all defendants' counsel. Defendants' counsel does not object to this request.

Thank you for your consideration of this matter.

Respectfully submitted,

Alijail Bluh

FAEGRE DRINKER BIDDLE & REATH LLP

Abigail M. Luhn

Honorable Ann Marie Donio

-2-

April 14, 2023

CC: Susana Cruz Hodge, Esq. (via ECF)
Stephen D. Holtzman, Esq. (via ECF)
Jeffrey S. McClain, Esq. (via ECF)
Michael Louis Testa, Sr., Esq. (via ECF)
Justin Robert White, Esq. (via ECF)
Jack N. Frost, Jr., Esq. (via ECF)
All Counsel of Record (via ECF)

So Ordered this 17th day of April 2023

Bv:

ANN MARIE DONIO, U.S.M.J.